

Report on Instructional Pools 2018 to 2021

In May of 2018, Rule R392-302—Design, Construction and Operation of Public Pools, was amended to add a definition of an instructional pool, and a temporary exemption from the requirements of the rule for new pools operating under this definition. Instructional pools were defined as a “pool used solely for purposes of providing water safety and survival instruction taught by a certified instructor. Instructional pools do not include private residential pools. Private residential pools used for swim instruction shall not be considered instructional pools as defined in this rule.”

During the exemption period, the Utah Department of Health (UDOH) staff investigated the public health-related experiences and science of instructional pools operating with the exemptions. This exemption expired on June 30, 2021. One pool was found to be operating under the exemption period. UDOH staff collected data once a month unless there were closures or complications due to COVID.

Key points from the past three years of data collection include:

- Instructional pools should comply with all portions of Rule R392-302 including design, construction, and water quality standards.
- Instructional pools should be exempt from portions of the rule that would restrict the use of teaching implements, including underwater tables, ledges, moveable stairs, etc.

Amendments to Rule R392-302—Design, Construction and Operation of Public Pools, are planned to replace the current section on instructional pools to reflect the findings of this investigation. These changes will be open for public comment. You may contact the Environmental Sanitation Program for more information.

A certified pool operator operated the pool under the exemption which was investigated by UDOH. Staff at the pool maintained a near 1:1 ratio of student to instructor. There were construction issues noted which were solved throughout the exemption period by making construction and equipment changes. These issues included poor air exchange ratio issues contributing to rapid degradation of interior ceilings and walls due to high humidity; water leaks in the pool due to an initial non-rigid construction; rusting of the pool structure; and safety hazards associated with the pool structure bending out from the edge of the pool deck. This bending was wide enough in some places for arms and legs, and in one spot, for a child’s head (about 4 inch gap), to get between the structural supports and the pool deck. Water quality testing showed the pool water had an acceptable Langelier Saturation Index score (-0.3 to +0.3) 72% of the time. There were no failed bacteriological tests from heterotrophic plate counts or coliform analysis.